

After reviewing RM-10620, I would like to voice my opposition to the change as it is proposed. While I feel that the FCC should have done a one time assimilation of the Novice into the Technician and Advanced into the Extra when the license classes were reduced and code requirements relaxed, this particular proposal is not the way to accomplish that assimilation. It appears to be a collection of wish list changes and does not successfully accomplish what should have been done in the past to begin with. This proposal would seemingly put even greater record keeping and enforcement requirements upon the FCC rather than lessen the overall burden and costs of record keeping.

Regarding the proposals for additional Novice frequency privileges, this again would be much more easily accomplished by simply moving all Novices to Technician. While I am very much in favor of the Novice licensee immediately receiving two meter privileges as this would add a large number of operators to the ranks of emergency communications operators pool, the privileges should be for the entire FM portion of the 2m band, not just a sub band within the normal band. The 2M frequencies proposed are too limited for normal 2 meter operations and emergency operations support.